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16 Francesco Corallo

17  
18 **UNITED STATES DISTRICT COURT**  
19 **NORTHERN DISTRICT OF CALIFORNIA**  
20 **SAN FRANCISCO DIVISION**

21 FRANCESCO CORALLO,

22 Plaintiff,

23 v.

24 NSO GROUP TECHNOLOGIES LIMITED,  
Q CYBER TECHNOLOGIES LIMITED, and  
25 APPLE, INC.,

26 Defendants.  
27  
28

Case No. 3:22-cv-05229-RS

**PLAINTIFF'S REPORT AS TO JUNE 6,  
2023 ORDER AS TO PROTECTIVE  
ORDER DISPUTE**

1 Plaintiff FRANCESCO CORALLO (“**Corallo**” or “**Plaintiff**”) files this report as to the  
2 Court’s June 6, 2023 order (ECF 80) as to protective order dispute, and states as follows:

3 1. The Court has allowed jurisdictional discovery to go forward with respect to  
4 Defendants NSO GROUP TECHNOLOGIES LIMITED and Q CYBER TECHNOLOGIES  
5 LIMITED (the “**NSO Defendants**”). NSO Defendants had been opposed to any jurisdictional  
6 discovery.

7 2. Pursuant to Court order dated May 16, 2023 (ECF 73), that discovery was permitted  
8 to be in the form of document requests as to jurisdictional issues.

9 3. As briefed to the Court, and is of-record, NSO Defendants served extensive  
10 objections to all jurisdictional discovery requested. No production has been made by NSO  
11 Defendants.  
12

13 4. In the May 16, 2023 Order, the Court instructed the parties to meet and confer on  
14 objections to the document request and to report by June 30, 2023. As the Court stated, a  
15 Magistrate may need to decide intractable discovery disputes remaining.  
16

17 5. Plaintiffs have attempted to schedule a meet-and-confer on NSO Defendants’  
18 extensive and complete objection to making discovery. Plaintiff has so far been unsuccessful but  
19 is optimistic that such a meet-and-confer could be accomplished by next week so as to dutifully  
20 report by the June 30, 2023 status report deadline.

21 6. Defendants’ filed a motion or entry of confidentiality order covering their potential  
22 production but did so simultaneously to Plaintiff receiving written responses/objections to  
23 discovery requests. Plaintiff stated in a filing made on June 6, 2023 (ECF 79) that Plaintiff was  
24 happy to meet and confer on the need and scope for a confidentiality order once written  
25  
26  
27  
28

1 responses/objections to the requests were in hand.<sup>1</sup> Given the very lengthy nature of the  
2 responses/objections, they required analysis.

3 7. On June 6, 2023 (ECF 80), the Court ordered as follows in relation to NSO  
4 Defendants' motion for entry of confidentiality order: "Accordingly, the parties are directed to  
5 resume their negotiations, which shall be held in person or by phone or video conference, unless a  
6 resolution is promptly reached by email. If no agreement can be reached, plaintiff may file an  
7 opposition to defendants' motion no later June 16, 2023, and the matter will then be taken under  
8 submission without further briefing or a hearing. Otherwise, and preferably, the parties shall submit a  
9 proposed protective order by that same date."

10  
11 8. As stated above, a status report on the meet-and-confer on jurisdictional discovery  
12 issues is due by June 30, 2023. Meanwhile, certain filings are also due by June 16, 2023 as to the  
13 proposed confidentiality order.

14 9. With these two dates in mind, and in order to be practical, Plaintiff respectfully  
15 suggests that the need and scope for a confidentiality order is dependent on the result of the meet and  
16 confer process on discovery objections, for which the parties have until June 30, 2023 to decide which  
17 issues remain.

18  
19 10. Accordingly, since the parties have so far not been able to schedule a date and time to  
20 meet and confer on pending discovery objections as well as the confidentiality order issue, Plaintiff  
21 respectfully suggests that the meet and confer process on both items be conducted and concluded by  
22 the end of next week, June 23, 2023, with a status report to follow immediately thereafter, to determine  
23 what issues are intractable and require referral to the Magistrate.

24 11. Alternatively, Plaintiff suggests that their June 6, 2023 filing (ECF 79) is their response  
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26 <sup>1</sup> "Plaintiff will confer with NSO Defendants, as ordered by the Court, as to the pending objections  
27 to jurisdictional discovery requests and demand for entry of a broad confidentiality order with an  
28 attorney's eyes provision. Plaintiff will also confer with NSO Defendants as to their lack of  
document production and will report to the Court on or before June 30, 2023, as ordered." ECF  
79 at p. 4.

1 to Defendants' request for entry of confidentiality order and requests all references to attorney's-eyes  
2 only be stricken for lack of showing of need for same.

3 Dated: June 16, 2023

4 Respectfully submitted,

5 **OSORIO INTERNACIONAL, P.A.**

6 /s/ Carlos F. Osorio  
7 Carlos F. Osorio (*pro hac vice admission*)  
8 Attorneys for Plaintiff Francesco Corallo

9 **CERTIFICATE OF SERVICE**

10 I HEREBY CERTIFY, that on this 16th day of June, 2023, a true and correct copy of the  
11 foregoing was electronically filed via the CMECF Filing Portal, which will serve this Notice on  
12 all counsel of record.

13 /s/ Carlos F. Osorio  
14 Carlos F. Osorio (*pro hac vice admission*)  
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